

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS INC.,)	
)	
Plaintiff,)	Civil Action No. 3:09-CV-620 (REP)
)	
v.)	
)	
LAWSON SOFTWARE, INC.,)	
)	
)	
)	
Defendant.)	

**DECLARATION OF DAVID M. YOUNG IN SUPPORT OF PLAINTIFF ePLUS INC.'S
OPPOSITION TO DEFENDANT LAWSON SOFTWARE, INC.'S
MOTION TO COMPEL**

I, David M. Young, declare as follows:

1. I am an attorney at Goodwin Procter LLP, counsel for Plaintiff ePlus, Inc. ("ePlus"). I submit this declaration in support of ePlus's Opposition to Defendant Lawson Software, Inc.'s ("Lawson's") Motion to Compel ePlus, Inc. to Respond to Interrogatories 19 and 20.

2. I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently hereto.

3. Attached hereto as Exhibit A is a true and accurate copy of correspondence from ePlus's counsel, Michael Strapp to Lawson's counsel, Joshua Graham, dated February 25, 2010.

4. Attached hereto as Exhibit B is a true and accurate copy of e-mail correspondence between ePlus's counsel, Eleanor Hynes Yost, to Joshua Graham, dated between February 26, 2010 and March 1, 2010.

5. Attached hereto as Exhibit C is a true and accurate copy of correspondence from ePlus's counsel, Jennifer Albert, to Lawson's counsel, William Schultz, dated December 15, 2009.

6. Attached hereto as Exhibit D are true and accurate copies of ePlus's Objections to Lawson's Fifth Set of Interrogatories, dated January 14, 2010, and ePlus's Answers to Lawson's Fifth Set of Interrogatories, dated January 29, 2010.

7. Attached hereto as Exhibit E is a true and accurate copy of correspondence from Joshua Graham to Michael Strapp, dated February 23, 2010.

I declare under penalty of perjury that the foregoing is true and correct. Executed at Washington, D.C. this 12th day of March, 2010.



David M. Young, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on the 12^h day of March, 2010, I will electronically file the foregoing

**DECLARATION OF DAVID M. YOUNG IN SUPPORT OF PLAINTIFF ePLUS INC.'S
BRIEF IN OPPOSITION TO DEFENDANT LAWSON SOFTWARE, INC.'S MOTION
TO COMPEL**

With the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

Daniel McDonald, *pro hac vice*
William D. Schultz, *pro hac vice*
Rachel C. Hughey, *pro hac vice*
Joshua P. Graham, *pro hac vice*
Andrew Lagatta, *pro hac vice*

MERCHANT & GOULD

3200 IDS Center

80 South Eighth Street

Minneapolis, MN 55402

Telephone: (612) 332-5300

Facsimile: 612) 332-9081

lawsonservice@merchantgould.com

Counsel for Defendant Lawson Software, Inc.

Robert A. Angle, VSB#37691
Dabney J. Carr, IV, VSB #28679
TROUTMAN SANDERS LLP
P.O. Box 1122

Richmond, Virginia 23218-1122

(804) 697-1238

(804) 698-5119 (Fax)

robert.angle@troutmansanders.com

dabney.carr@troutmansanders.com

Counsel for Defendant Lawson Software, Inc.

/s/

David M. Young (VSB #35997)

GOODWIN PROCTER LLP

901 New York Avenue, N.W.

Washington, DC 20001

Telephone: (202) 346-4000

Facsimile: (202) 346-4444

dyoung@goodwinprocter.com

Counsel for Plaintiff, ePlus Inc.